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**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

LISA LIBERI, et al.,)	No. C 09 1898 ECR
)	RESPONSE TO EMERGENCY
)	MOTION (DOCUMENT 122)
Plaintiffs)	REQUEST TO TREAT
)	EMERGENCY MOTION AS
v.)	ADMISSION OF FRAUD & PERJURY
)	BY PLAINTIFFS LIBERI AND BERG
ORLY TAITZ, et al.,)	MOTION TO STRIKE DOCUMENT 122
)	REQUEST FOR SANCTIONS, FEES, &
Defendants.)	DAMAGES

JUN 20 2010

MICHAEL E. RUNZ, Clerk
~~City severed~~ Dep. Clerk

On June 4, 2010 Your Honor closed the case *Liberi v Taitz* and properly severed the case, as it involved multiple parties and different nuclei of action. Due to thousands of pages of documents filed by plaintiffs' attorney Berg your Honor did not notice documents attesting to the fact that Berg and Liberi committed fraud and perjury by bringing this case in the first place and claiming that Liberi was a citizen of Pennsylvania which she is not.

The whole essence of the case boils down to this one fact: whether Liberi is a citizen of the state of Pennsylvania or is Liberi, assistant of Attorney Berg a felon convicted of document forgery and grand theft, who cannot reside in Pennsylvania due to the terms of her probation in California. Berg and Liberi claimed that the fact that Taitz has published an official record of the Superior Court in California, attesting to her conviction, and alerting the public, constituted Slander and Defamation of character of a supposedly innocent woman, Lisa Liberi, who is a legal assistant of Attorney Berg and who is a citizen of and resides in Pennsylvania. If your Honor made the decision that this Liberi is a citizen of Pennsylvania, it de facto decided the case.

Taitz properly responded by providing evidence and facts:

1. Berg and Liberi claim that Liberi is a citizen of Pennsylvania based on their word only and based on the fact that Berg submitted his business address as Liberi's address.
2. Taitz has spent hours doing research and provided Liberi's own sworn statement that she signed in the Federal Bankruptcy court in California and submitted to be filed as a public record, showing her as a citizen of California.
3. Taitz has submitted a second sworn declaration by Liberi that she signed and submitted into the public record in California in her criminal trial held in San

Bernardino County, California.

4. Taitz has submitted an official record of Liberi's convictions in California and the conditions of her probation, showing her on probation in California until March 23, 2011, with the only permission to leave California, to be with her family in New Mexico, provided that the probation department agreed. Even if Liberi wanted to move to Pennsylvania, she could not do so based on the terms of her probation.
5. All of these documents clearly showed that Berg and Liberi have committed perjury, fraud upon this court, filed a frivolous action and harassed the defendants for over a year with thousands of pages of frivolous pleadings while knowing all along that Liberi is indeed that Lisa Liberi, who was convicted in California and whose public criminal record was published by Taitz in April of 2009 and cannot possibly reside in Pennsylvania. If Taitz is correct this means there was no diversity and the current action was improperly filed in this court and needs to be dismissed. This harassment need to stop immediately and plaintiffs need to pay damages for over a year of harassment of Taitz.
6. If Taitz, was wrong, Berg was supposed to provide evidence showing that the Lisa Liberi who filed this law suit is indeed residing in Pennsylvania and is not the same Lisa Liberi who was convicted in California. If she is indeed

a different person, than the social security number of Liberi from California is not hers, which means that Plaintiffs' motion makes fraudulent assertions, as in the motion Berg claims, that Liberi is not the same person, but the social security number is hers. That is a clear evidence of fraud for which the Plaintiffs need to be sanctioned.

7. Despite the factual dispute, Berg did not provide any evidence showing Liberi to be residing in Pennsylvania and being a different person from the Liberi convicted in California of multiple felonies.
8. By providing zero evidence to refute the Taitz response, Berg and Liberi de facto admitted to committing fraud and perjury in filing this legal action in the first place. They simply intentionally and in bad faith harassed the defendants with the only goal of obfuscating the record, of keeping from the public Liberi's criminal past, while they continue filing law suits, using the convicted forger Liberi as a legal assistant and while being engaged in nationwide fundraising drives, collecting money with the convicted thief Liberi assisting attorney Berg and representing a serious danger to public at large.
9. This court has indicated time and again that the only issue it is reviewing is the issue of Jurisdiction. As Taitz has proved by overwhelming evidence submitted to this court that Liberi and Berg lied, committed perjury and

defrauded this court by claiming that Liberi is a citizen of Pennsylvania, whereby there is no diversity and this case needs to be dismissed with prejudice and Plaintiffs need to be ordered to pay sanctions, attorneys fees and damages to the Defendants for knowingly and maliciously filing a frivolous action in a wrong jurisdiction. In the alternative this case needs to be dismissed without prejudice. If Liberi believes that she has a valid cause of action, her proper remedy will be to file in the state court of California. Defendants move to strike all of Plaintiff's motion from June 17, 2010 as highly prejudicial, inflammatory and irrelevant to the only issue at hand, namely the issue of jurisdiction. Documents submitted by Taitz are part of public record, personally signed and submitted by Liberi herself to be filed in public records of the Bankruptcy Court and Superior Court, these are documents that can easily be accessed by the public and were accessed by the public.

10. Taitz has submitted those documents out of necessity, since Liberi and Berg have committed perjury, fraud on the court and filed a legal action with the improper purpose to harass the Defendants. Defendants had to provide those records to prove to the court that perjury and fraud were indeed committed by Liberi and Berg.

11. When faxing the documents to the court, Taitz did not notice that Liberi's

declarations contained social security numbers, as this was not the purpose of the submittal as Plaintiffs allege without proof.

12. Taitz did not expect those documents to be filed and published by the court, as nothing submitted by her since beginning of this year has been filed, while for a reason not known yet, a letter by Berg, containing hundreds of pages of attachments with inflammatory , unrelated and defamatory documents were filed.

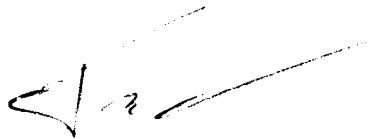
13. While reading the latest motion by Berg, Taitz has found that Liberi has used two different social security numbers on those forms. Moreover, in her filing with the Bankruptcy Court under penalty of perjury Liberi claims that she does not have any other social security numbers. Similarly in her sworn statement/complaint against the District Attorney prosecuting her, she provides only one social security number, different from the number filed with the bankruptcy court. This shows a continuous pattern of fraud upon a number of governmental agencies: The US Bankruptcy court, The Superior Court of California, the Social Security Administration, the IRS and the San Bernadino County Probation Department. Defendants are requesting this Honorable court to forward this information to the above agencies for criminal prosecution of Liberi for fraud and social security fraud and Berg for aiding and abetting fraud and Social Security fraud.

Wherefore the Defendants are asking this Honorable court:

1. To dismiss this case with prejudice due to the fact that the case was filed in the improper jurisdiction and was filed based on fraud and perjury and with an improper purpose to harass and vex the Defendants.
2. Sanction the Plaintiffs for filling a frivolous action based on fraud and perjury and for improper purpose of harassment of Defendants.
3. Forward to the Social Security Administration, as well as Bankruptcy Court Trustee, the IRS and the San Bernardino County Superior Court and District Attorney information provided above for criminal prosecution of Liberi for perjury and fraud, as well as criminal prosecution of Berg for perjury and fraud and aiding and abetting fraud.
4. Forward to the Ethics Committee of this court as well as Pennsylvania State Bar the above information for investigation of violations of professional ethics by attorney Philip Berg.

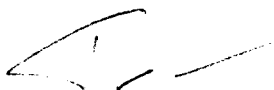
Respectfully submitted,

Date: June 20, 2010



/s/ Orly Taitz, ESQ pro se and for Defend Our Freedoms Foundation

I, Orly Taitz, attest that true and correct copy of the above pleadings was sent to Attorney Philip Berg by first class mail, as well as other Defendants in this case.



/s/ Orly Taitz

June 20, 2010

TRANSMISSION VERIFICATION REPORT

TIME : 06/21/2010 10:34
NAME : FEDEX OFFICE 0364
FAX : 949--362-1957
TEL : 9493621900
SER.# : 000E6J661504

DATE, TIME	06/21 10:31
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